

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
Ronald N. Cameron,) Case No. 19-21423 CMB
Debtor) Chapter 13
Related to Docket No. 64 and 65
Ronda J. Winnecour, Chapter 13 Trustee,)
Movant)
vs.)
Ronald N. Cameron,)
Respondent)

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes the Debtor, Ronald N. Cameron, by and through attorney, Christopher M. Frye and Steidl and Steinberg, P.C., and respectfully responds to the Movant's motion as follows:

1. Admitted.
2. Admitted.
3. Admitted by way of further answer. The Debtor has made all monthly payments as called for in the Plan. However, it appears that the Plan was underfunded and additional payments are needed to pay sufficient amounts to meet Plan goals.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. The Debtor will continue to pay the Trustee until the goals of the Plan are met. The Debtor believes that an additional 60 to 90 days will be sufficient to complete the Plan.

WHEREFORE, the Debtor, Ronald N. Cameron, respectfully requests this Honorable Court to deny the Movant's motion.

Respectfully submitted,

April 22, 2024

DATE

/s/ Christopher M. Frye

Christopher M. Frye, Esquire

Attorney for the Debtor

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